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10	PATRÉON, INC.				
11	UNITED STATES DISTRICT COURT				
12	NORTHERN DISTRICT OF CALIFORNIA				
13	SAN FRANCISCO DIVISION				
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16	BRAYDEN STARK, JUDD OOSTYEN, ISAAC BELENKIY, VALERIE BURTON,	Case No. 3:22-CV-03131-JCS			
17	LAURA GOODFIELD, and DENOVIAS MACK, individually and on behalf of all	DECLARATION OF CELINE G. PURCELL IN SUPPORT OF DEFENDANT PATREON, INC.'S			
18	others similarly situated,	ADMINISTRATIVE MOTION TO SEAL PORTIONS OF PLAINTIFFS' REPLY IN			
19	Plaintiffs,	SUPPORT OF THEIR MOTION TO SUPPLEMENT THE SUMMARY JUDGMENT			
20	V.	RECORD			
21	PATREON, INC.,				
	Defendant.				
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	DECL. OF CELINE G. PURCELL ISO DEF. PATREON'S ADMI	IN. MTN. TO SEAL PORTIONS OF PLTFS' REPLY ISO THEIR MTN. TO			
ı	SUPP. THE SUMMARY JUDGMENT RECORD				

CASE No. 3:22-CV-03131-JCS

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1. I am an attorney admitted to practice law in California and before this Court. I am an associate at The Norton Law Firm PC and counsel of record for Defendant Patreon, Inc. I submit this declaration in support of Defendant Patreon, Inc's Administrative Motion to Seal Portions of Plaintiffs' Reply In Support Of Their Motion To Supplement The Summary Judgment Record. Except where otherwise stated, the statements in this declaration are based on my own personal knowledge and, if called to do so, I could and would testify competently to them.

- 2. A party seeking to seal certain filings must demonstrate that "compelling reasons" exist for the requested sealing. *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006). Requests for sealing must be narrowly tailored, using redactions instead of wholesale sealing where possible. *See* L.R. L.R. 79-5(b).
- 3. Patreon has compelling reasons to seek the sealing of specific, redacted portions of Plaintiffs' Reply In Support Of Their Motion To Supplement The Summary Judgment Record. Specifically, Plaintiffs' Reply discusses third party software Ketch and references various information and arguments filed under seal in Patreon's Opposition to Plaintiffs' Motion to Supplement the Summary Judgment Record. The contract between Ketch and Patreon stated:
 - 16.2. Except as otherwise set forth in an Order Form, neither party will make any public statement relating to this Agreement without the prior written approval of the other, except that [Ketch] may include Customer's name and logo in its marketing, promotional materials, and customer lists.

Patreon has not obtained Ketch's approval.

4. Accordingly, Patreon moves to seal portions of the following document:

Document	Description	Designating Party	
Reply	Plaintiffs' Reply in Support of	Patreon, Inc.	
	Motion to Supplement the		
	Summary Judgment Record:		
	Page 2, lines 27-28;		
	Page 3, lines 6-7, 9, 11;		
	Page 4, lines 2-4, 6, 15-16		

1	5. Consistent with L.R. 79-5(b), this request is narrowly tailored because it seeks to seal		
2	only the confidential and sensitive information at issue, including by using redactions, rather than the		
3	sealing of entire documents.		
4	I declare under penalty of perjury and the laws of the United States that the statements in this		
5	declaration are true and correct to the best of my knowledge, and that this declaration was executed on		
6	March 13, 2024 in San Carlos, California.		
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8	/s/ Celine G. Purcell Celine G. Purcell		
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DECL. OF CELINE G. PURCELL ISO DEF. PATREON'S ADMIN. MTN. TO SEAL PORTIONS OF PLTFS' REPLY ISO THEIR MTN. TO SUPP. THE SUMMARY JUDGMENT RECORD CASE NO. 3:22-CV-03131-JCS